

RCRA INSPECTION REPORT:
CONTACT INDUSTRIES DIVISION OF SAFEGUARD CHEMICAL
641 Dowd Avenue
Elizabeth, NJ 07201

Inspector: Marianna Dominguez, Environmental Engineer, DECA/RCB

Date of Inspection: April 15, 2004

EPA Handler ID #: NJD002052017

Reason for Inspection: Compliance Evaluation Inspection

Attendees: Marianna Dominguez, Inspector, USEPA, (212) 637-4154
Louis Van Bergen, Plant Manager, Contact Industries, (908)351-5900
Honglie Hu, Technical Director, Contact Industries, (908)351-5900

Background:

The facility has been in operation since 1981 at this location. Parent company is Safeguard Chemical Corporation since 1981, so the facility name is Contact Industries Division of Safeguard Chemical Corporation. Facility building is owned by Palin Enterprises of New York, built in 1964.

Contact Industries is engaged in the manufacturing primarily of aerosols, general house cleaners, glass cleaners, furniture polishes, air fresheners, automotive products: carburetor cleaners, brake cleaners, solvent and water based cleaners. There is a quality control laboratory but there was no work at the time of the inspection. It employs 24 full time employees, one shift, five days a week. 18 to 20 % of the work is contract packaging which means that if someone has a manufacturing idea and does not have the facility to manufacture the product, Contact Industries will do it as a contractor.

Maintenance consist of scaling pipes, floor painting once/year, sweeping floors daily (sweepings go to regular garbage). Equipment clean up is done with mineral spirits and residuals are collected in a 55-gallon container and trucked away by Safety Kleen. Boiler condensates go to the sanitary sewer system after cooling it down in a small tank.

As a result of its manufacturing operations and maintenance activities, Contact Industries generates hazardous waste as a large quantity generator. Hazardous wastes generated are: spent solvents, Toluene, Xylene, Methanol, IPA, Perchloroethylene, Trichloroethane and Acetone. Hazardous waste are identified as D001, F002, F005.

I filled out the Multi-Media check list at the time of the meeting followed by the record review.

Record Review:

The record review started with:

- a. Manifest records: they were in order.
- b. MSDS sheets were available.
- c. Contingency Plan needs up date to incorporate the gas room.
- d. Bi-annual report, was available, facility generated more than twenty tons of hazardous waste last year.
- e. Training records were incomplete, as well as training program.

Next item on the inspection agenda was the tour of the facility.

Tour of the facility

We started the tour of the facility by the warehouse, then to the laboratory, no work done at the time of the inspection, no hazardous waste was found in the laboratory at the time of the inspection. We went

- Arrangements made with local agencies?
- Emergency responders a must take familiar with facility layout?
(Not a violation here)

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to the manufacturing area, no work was being done at the time of the inspection. No hazardous waste was found here. As part of the manufacturing operation there is a gas room where propellant is added to the containers for sprays. The gas room is equipped with an explosion proof sensor which detects excess amounts of gas (isobutane and propane). The sensor shuts off equipment in the room which also includes the conveyor that conveys the cans with manufactured liquids going for propellant which is the last stage of the process, after this stage, the product is finished and is ready to go to the consumer. When the alarm rings, the exhaust fan simultaneously goes on at a high speed to draw the gas out of the room. There are safety glass doors in the compressor area which are a little shattered due to the traffic in the area.

This gas room and its alarm system is not addressed in the contingency plan.

The final area to be visited was the hazardous waste storage area, located outside, in an open area exposed to the weather. There were fifteen 55-gallon containers of hazardous waste on pallets. The containers were holding F005 hazardous waste. They were all labeled as hazardous waste, however, six of them had no dates shown on them. There was no alarm or communication system in the hazardous waste storage area. I brought this to their attention and suggested an indoor location of the hazardous waste storage area or a shed. Facility representatives want this to be addressed in the correspondence to be sent to them so that they can present this to upper management.

This was the end of the tour of the facility.

We went back inside for the closing interview.

Closing Interview:

The closing interview with facility's representatives:

I addressed the concerns found during the inspection, the violations first: dates on containers of hazardous waste, lack of alarm or communication system in the hazardous waste storage area, up date of the contingency plan, lack of training program. I pointed out the poor housekeeping; I thanked them for their cooperation and their willingness to comply with the regulations.

Recommendations:

An NOV should be sent to the facility addressing the following violations:

1. 40 C.F.R. § 262. 34(a)(2)(1998) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

At the time of the inspection there were six (out of fifteen) 55-gallons containers of hazardous waste F005, that did not have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container.

2. 40 C.F.R. § 262. 34(a)(4)(1998) and 40 C.F.R. §265.54(e)(1998) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the generator has a contingency plan. The contingency plan must be reviewed, and immediately amended, if necessary, whenever the emergency equipment changes.

At the time of the inspection the contingency plan available did not address the emergency equipment in the gas room.

3. 40 C.F.R. § 262. 34(a)(4)(1998) and 40 C.F.R. §265.16(a)(1)(1998) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim

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status provided that the facility personnel successfully complete a program of classroom instruction or on the job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under Paragraph (d)(3) of this section.

At the time of the inspection the facility did not have a training program in place.

4. 40 C.F.R. § 262.34(a)(4)(1998) and 40 C.F.R. §265.32(b)(1998) require that all facilities must be equipped with a device, such as a telephone(immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire departments or State or local emergency response teams.

At the time of the inspection the facility did not have a telephone or emergency device capable of summoning emergency assistance.

+ Concern re storage of containers outside

CHEMICALS

<u>CHEMICAL NAME</u>	<u>CAS NUMBER</u>
* A-46 (Propane/Isobutane)	68-476-86-8 <u>X11</u>
* A-70 (Propane/Isobutane)	68-476-86-8
* Acetone	67-64-1
* Amsco Solv #5740 (EM Glycol Ether)	109-86-4
Acintol EPG (Tall Oil Fatty Acid)	61790-12-3
* Adhesive PS5692 (Heptane)	142-82-5
* Aqua Ammonia 26 ⁰	1331-21-6
Arlacel-C (Sorbitan Sesquioleate)	8007-43-0
Aluminum Paste	7429-90-5
Alcan-Copper MD-650	7440-50-8
Alcan-Pale Gold MD-650	7440-50-8
* Aromatics 150 (Petroleum Distillate)	91-20-3
AMP 95% (2-Amino-2-methyl-1-propanol)	124-68-5
Ammonyx SO (Amine Oxide)	2571-88-2
* Amyl Acetate	628-63-7
Acetulan (Cetyl Acetate/Acetylated Lanolin Alcohol)	629-70-9/61788-49-6
Alox - 2028 C (Naphthenic Oil)	64742-52-2
Alox - 2213 C (Naphthenic Oil)	64742-88-7
Acryloid B-72 (Acrylic Polimer)	108-88-3
Bees Wax	8002-74-2
Borax (Boric Acid)	1130-12-4
* Butyl Alcohol	71-36-3
BTC-2125M-50%	68391-01-5/68956-79-6
Bentone 38 (Magnisium Silicate)	14807-96-6
* Cab-O-Sil M-5 (Silicate)	12945-52-5
* Carbon Dioxide	124-38-9 <u>X1</u>
Carnauba Wax - Yellow Flake	8002-74-2
Carbowax #600 (Polyethylene Glycol)	25322-68-3
Caster Oil	8001-79-4
Catnip Fluid Extr. 31-39% (Ethanol)	64-17-5
Coconut Oil	8001-31-8
Crotein AD. Anhy (Ethanol)	64-17-5
Carum #330	8042-47-5
Coray #22 (Petroleum Oil)	64742-53-6
D-Limonene	5989-27-5
Dipropylene Glycol	110-98-5
Damar Dewaxed (Toluene/Ethanol)	108-88-3/64-17-5
* Di-Isopropyl Adipate	27754-27-3
Deriphat 151-C (Polyethylene Glycol)	25322-68-3
* Dioctyl Phthalate	117-81-7
* Ethyl Acetate 99%	141-78-6
* Ethyl Alcohol (SDA-40-2)	64-17-5 <u>X1</u>
* Ethylene Glycol	107-21-1
Ethyl Cellulose	9004-57-3
Flokote #64 (Starch)	9005-84-9
Gantrez ES-425 (Surfactant)	25119-68-0
G-3780-A (Surfactant)	107-21-2
Glycerine 96%	56-81-5
* Glycol Ether-Cellosolve Acetate	111-15-9
* Glycol Ethher DE	111-90-0

* Glycol Ethher DPM	34590-94-8
* Glycol Ether EB	111-76-2
* Glycol Ether EM	109-86-4
Gibro 4% (Polyethylene Glycol)	25322-68-5
* Hi-Sil #233 (Silicate)	7631-86-9
Hamposyl L30 (Benzethonium Cl	121-54-0
Hexylene Glycol	107-41-5
* Heptane	142-82-5
* Hexane	110-54-3
* Isopar C (Isoparaffanic Hydrocarbon)	64742-48-9
* Isopar M (Isoparaffanic Hydrocarbon)	64742-48-9
* Isopar E (Isoparaffanic Hydrocarbon)	64742-48-9
* Isopropanol	67-63-0
Igepal CO-210 (Nonylphenoxypoly(etheneoxy)ethanol	75-21-8
Igepal CO-630 (Nonylphenoxypoly(etheneoxy)ethanol	9016-45-9
Industrene 106 (Coconut Fatty Acid)	61788-47-4
Industrene 325 (Coconut Fatty Acid)	61788-47-4
Isopropyl Palmitate	142-91-6
Isopropyl Myristate	110-27-0
* Diazinon MG-8	333-41-5
Kaopolite SF (Kaolin)	1332-58-7
Kler-Sulf 240 (Petroleum Oil)	64742-52-5
Kelzan (Xanthan Gum)	11138-66-2
Klucel M. (Polyethylene Glycol)	25322-68-3
* Kerosene	8008-20-6
Lanolin, USP	8006-54-0
Lexein A-210 (Hydrolyzed Protein 20%)	72319-06-3
Lexol PG-800 (Polyethylene Glycol)	25322-68-3
Ludox AM (Silicon Dioxide)	7631-86-9
* Methanol	67-56-1
* Mineral Spirits	8052-41-3
Mink Oil	8042-47-5
Monoflex - DBS (Diethanolamine)	111-42-2
Monamine ALX-100S (Diethanolamine)	111-42-2
Methocel Fam-PRG (Methyl Cellulose)	9004-65-3
* Monoethanolamine	141-43-5
Methyl Salicylate	119-36-8
M-Pyrol (n-Methylpyrrolidone)	872-50-4
Morpholine	110-91-8
* Mineral Oil - Drakeol #5	8042-47-5
* Mineral Oil - Drakeol #7	8042-47-5
* Mineral Seal Oil	64741-44-2
* Mistron Vapor (Talc)	14807-96-6
* Moly Lube - (Molybdenum)	1317-33-5
* Manganese 12% Nuxtra.	37449-19-7
* Napatha VM&P	64742-89-8
* Naptha-Super High Flash	8030-30-6
Neocryl B-810 (Acrylic Polymer)	108-88-3
Nasul BSB (Barium Dinonylnaphthalene Sulfonate)	25619-56-1
Neutronyx 656 (Diethanolamine)	9016-45-9/111-42-2
NN-Dimethyl-P-Toluibine	99-97-8
PM Acetate	108-65-6
* Nitrobenzene	98-95-3
* Ortho Dichlorobenzene	95-50-1

D110

X2 TOP

X2 Bottom

X2

Octyl Dimethyl PABA U.S.P (Ethanol)	64-17-5
Polybutane - 24	9003-29-6
Polybutene -32	9003-29-6
P.E. 1810 (Water)	7732-18-5
Parafin Wax 128/130	8002-74-2
PD-25 (Ethanol)	64-17-5
* Perchloroethylene	127-18-4 X 1
* Perma Klear -100 (E.D.T.A.)	64-02-8
Polypeptide S.F.	7732-18-5
Polypeptide 37	7732-18-5
Propylene Glycol	57-55-6
Protachem CG (Nonylphenoxypoly(ethyleneoxy)ethanol)	9016-45-9
Protachem NP-9 (Nonylphenoxypoly(ethyleneoxy)ethanol)	9016-45-9
Protamide L80M (Nonylphenoxypoly(ethyleneoxy)ethanol)	9016-45-9
PVP/VA I-735 (Polymer)	25086-89-9/67-63-0
PVP/VA I-535 (Polymer)	25086-89-9/67-63-0
Piccolastic D-125 (Acrylic Polymer)	9003-53-6
* Phosphoric Acid 85%	7664-38-2
Resyn - Polypale (Isopropanol)	67-63-0
Resin #28-2930 (Acrylic Polymer)	9003-53-6
Rhoplex B-832 (Isopropanol)	67-63-0
Silicone SF-96-5 cs (Polydimethylsiloxane)	63148-62-9
Silicone SF-96-20cs (Polydimethylsiloxane)	63148-62-9
Silicone SF-96-50cs (Polydimethylsiloxane)	63148-62-9
Silicone 100 cs. (Polydimethylsiloxane)	63148-62-9
Silicone 350 cs (Polydimethylsiloxane)	63148-62-9
Silicone SF-96-500cs (Polydimethylsiloxane)	63148-62-9
Silicone SF96-1000 (Polydimethylsiloxane)	63148-62-9
Silicone 10000 cs. (Polydimethylsiloxane)	63148-62-9
Silicone 12500 cs. (Polydimethylsiloxane)	63148-62-9
Silicone DC-200-60000 (Polydimethylsiloxane)	63148-62-9
Silicone SF-1080 (Polydimethylsiloxane)	63148-62-9
Silicone SM-2133 (Polydimethylsiloxane)	63148-62-9
Silicone SM-2135 (Polydimethylsiloxane)	63148-62-9
Silicone SM-2162 (Polydimethylsiloxane)	63148-62-9
Silicone S.S.-4098 (Polydimethylsiloxane)	63148-62-9
Silicone L-7600 Silwet (Polydimethylsiloxane)	63148-62-9
Silicone SR-323 (Polydimethylsiloxane)	63148-62-9
Silicone Fluid 203 (Polydimethylsiloxane)	63148-62-9
Silicone Fluid 230 (Polydimethylsiloxane)	63148-62-9
Silicone Fluid DC-470A (Polydimethylsiloxane)	63148-62-9
Silicone Fluid 473 (Polydimethylsiloxane)	63148-62-9
Silicone L-45 10cs (Polydimethylsiloxane)	63148-62-9
Stabelite Ester #10	65997-13-9
Sodium Chromate	7775-11-3
* Sulfuric Acid	7664-93-9
Skino #1 (Butyraldoxime)	110-69-0
Santicizer 160 (Butyl Benzyl Phthalate)	85-68-7
Solulan 16 (Acetylated Lanolin Alcohol)	61791-20-6
Solulan 98 (Polysorbate Cetyl Acetate)	9005-65-6
Sodium Nitrite	7632-00-0
Sodium Benzoate	532-32-1
* Sodium Hydroxide 50%	1310-73-2
Sodium Metasilicate Penta	6834-92-0

Standapol WAQ-LC (Sodium Lauryl Sulfate)	68585-47-7
Sunvis #7150 (Petroleum Oil)	64741-88-4
Sunvix #732 (Petroleum Oil)	54741-88-4
Span 60 (Sorbitan Tristearate)	1338-43-8
Span 80 (Sorbitan Monooleate)	1338-43-8
Stearic Acid - Flakes	57-11-4
Sarkosyl NL-30	137-16-6
(Sodium Lauroyl Sarcosinate 30%)	
Syloid AL-1 (Silicate)	63231-67-4
* Talc #1625	14807-96-6
* Toluene	108-88-3
Tween 20 (Polyoxyethylene(20) Monolaurate)	9005-64-5
Tween 60 (Polyoxyethylene(20) Monostearate)	9005-65-5
Tween 80 (Polyoxyethylene(20) Monooleate)	9006-65-6
Triton X-100 (Nonylphenoxypoly(ethyleneoxy)ethanol)	9036-19-5
Triisopropanolamine 99	102-71-6
Triethylene Glycol	111-27-6
Triethanolamine 99%	102-71-6
Tergitol 15-S-5 (Alkyloxypolyethyleneoxyethanol)	68131-40-8
Tergitol 15-S-9 (Alkyloxypolyethyleneoxyethanol)	68131-40-8
Telura #323 (Hydrogenated Naphthalic)	64742-53-6
Titanium Dioxide #328	13463-67-7
Versene 100 (EDTA)	64-02-8
* Trichlorethylene	79-01-6 X2
White Lithium Grease (Mineral Oil)	8042-47-5
Witconol 14 (Polyglycerol Ester of Oleic Acid)	9007-48-1
Witcamide 272 (Diethanolamine)	111-42-2
* Xylene	1330-20-7
Perferm Oil (Propylene Glycol)	57-55-6

* : Hazardous material



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAY - 5 2004

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Article number: 7002 2030 0006 5358 3273

Louis J. Van Bergen
Plant Manager
Contact Industries Div. of Safeguard Chemical Corp.
641 Dowd Avenue
Elizabeth, New Jersey 07201

Re: **Notice of Violation**
Contact Industries, EPA ID #NJD002052017

RCB ID# 04-0000-3008-61

Dear Mr. Van Bergen:

The U.S. Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq.

Pursuant to RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), the EPA promulgated rules, regulations, and standards governing the handling and management of hazardous waste as set forth in 40 C.F.R. Parts 260-272. For the purposes of this Notice of Violation, the hazardous waste regulations governing the generation of hazardous waste were promulgated in 1980 and amended by HSWA in 1984.

The State of New Jersey is authorized by the EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926 and is authorized to enforce RCRA. The current New Jersey hazardous waste program incorporates by reference the federal program at 40 Code of Federal Regulations (C.F.R.) Parts 124, 260-266, 268 and 270, as set forth in the 1998 edition of the C.F.R. The EPA has retained its authority to enforce the hazardous waste rules and regulations in the State of New Jersey as those are set forth in the 1998 edition of the C.F.R. EPA retains primary responsibility for requirements promulgated pursuant to HSWA since July 31, 1998.

This Notice of Violation (NOV) is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901, 6928.

On or about April 15, 2004, a duly authorized representative of EPA conducted an inspection of Contact Industries, Division of Safeguard Chemical Corp, located in Elizabeth, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. The review of the manifest records indicates that Contact Industries is a large quantity generator of hazardous waste.

During this inspection, the inspector found the following violations of the Large Quantity Generators General requirements:

1. 40 C.F.R. § 262. 34(a)(2)(1998) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

At the time of the inspection there were six (out of fifteen) 55-gallons containers of hazardous waste F005, that did not have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container.

Contact Industries' failure to have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container is a violation of 40 C.F.R. § 262. 34(a)(2)(1998).

Contact Industries must have clearly marked and visible for inspection on each container the date upon which each period of accumulation begins when such container is stored in the hazardous waste storage area.

2. 40 C.F.R. § 262. 34(a)(4)(1998) and 40 C.F.R. §265.54(e)(1998) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the generator has a contingency plan. The contingency plan must be reviewed, and immediately amended, if necessary, whenever the emergency equipment changes.

At the time of the inspection the contingency plan available did not address the emergency equipment in the gas room.

Contact Industries' failure to have its contingency plan updated to include the above specified emergency equipment is a violation of 40 C.F.R. § 262. 34(a)(4)(1998) and 40 C.F.R. §265.54(e)(1998)

Contact Industries must update the contingency plan to reflect the existing conditions in the gas room and the emergency equipment in there, and submit the contingency plan to the EPA as indicated below.

3. 40 C.F.R. § 262. 34(a)(4)(1998) and 40 C.F.R. §265.16(a)(1)(1998) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the facility personnel successfully complete a program of classroom instruction or on the job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under Paragraph (d)(3) of this section.

At the time of the inspection the facility did not have a training program in place.

Contact Industries' failure to have a training program in place is a violation of 40 C.F.R. § 262. 34(a)(4)(1998) and 40 C.F.R. §265.16(a)(1)(1998)

Contact Industries must develop and implement a training program and submit documentation to EPA as indicated below.

4. 40 C.F.R. § 262.34(a)(4)(1998) and 40 C.F.R. §265.32(b)(1998) require that all facilities must be equipped with a device, such as a telephone(immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire departments or State or local emergency response teams.

At the time of the inspection the facility did not have a telephone or emergency device capable of summoning emergency assistance.

Contact Industries' failure to have a telephone or emergency device capable of summoning emergency assistance in the hazardous waste storage area, is a violation of 40 C.F.R. § 262.34(a)(4)(1998) and 40 C.F.R. §265.32(b)(1998).

Contact Industries must install a telephone or emergency device capable of summoning emergency assistance in the hazardous waste storage area.

5. 40 C.F.R. § 262.34(a)(4)(1998) and 40 C.F.R. §265.31 require that facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment

It was observed during the inspection that Contact Industries' hazardous waste storage area is located outside, in an open area, near the gas room. Containers were stacked up two high, placed on wooden pallets that were lying on an uneven dirt ground surface, and neither a telephone or alarm system were available for an emergency situation.

Contact Industries needs to relocate the hazardous waste storage area inside the facility or in an individual storage shed that meets the specifications for hazardous waste storage.

A response which includes [1] a description of the actions you have taken to correct the violations 1 through 5 cited above and [2] documentation demonstrating that the violations 1 through 5 have been corrected, must be submitted within thirty (30) calendar days of the receipt of this correspondence.

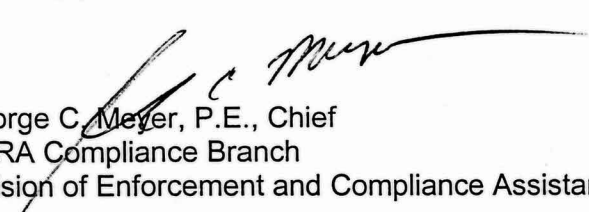
This information must be sent to:

Miss Marianna Dominguez
Environmental Engineer
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency- Region 2
290 Broadway, 22nd Floor
New York, NY 10007-1866

Failure to respond in full or in part to the above requirements is a violation of RCRA and will result in federal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, including the potential assessment of a monetary penalty. Such penalties may be up to \$32,500 per day per violation.

If you have any questions regarding this matter, please contact Ms. Marianna Dominguez at (212) 637-4154 or e-MAIL dominguez.marianna@epa.gov. In addition, you may direct questions regarding the hazardous waste regulations to the RCRA/Superfund/EPCRA Hotline at (800) 424-9346.

Sincerely yours,



George C. Meyer, P.E., Chief
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance

cc: J. Mirabel, Chief
Bureau of Hazardous Waste Compliance and Enforcement
Central Region Field Office
New Jersey Department of Environmental Protection

If you have any questions regarding this matter, please contact Ms. Marianna Dominguez at (212) 637-4154 or e-MAIL dominguez.marianna@epa.gov. In addition, you may direct questions regarding the hazardous waste regulations to the RCRA/Superfund/EPCRA Hotline at (800) 424-9346.

Sincerely,
Respectfully signed by
George Meyer

George C. Meyer, P.E., Chief
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance

cc: J. Mirabel, Chief
Bureau of Hazardous Waste Compliance and Enforcement
Central Region Field Office
New Jersey Department of Environmental Protection

bcc: M. Dominguez ✓